

MOSER LAW FIRM, PC



Steven J. Moser

Tel: 631-824-0200

steven.moser@moserlawfirm.com

---

June 16, 2023

**VIA ECF**

Hon. Joan M. Azrack, USDJ  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Zaldivar v JANL Inc*, Case No. 23-cv-01434(JMA)(LGD)

Dear Judge Azrack:

Please accept this status report on behalf of the Plaintiff. This action was commenced on February 24, 2023. Shortly after the action was commenced, but before the summonses were served, I was contacted by an attorney representing the defendants. We engaged in pre-answer negotiations to resolve the case. However, these negotiations were ultimately unsuccessful and we were advised this week that said attorney has not yet been retained by the Defendants for the purposes of defending the instant litigation.

Pursuant to Rule 4(m), Plaintiff respectfully moves for 30 days from today's date to serve the defendants. Should the Court grant such request, we will contemporaneously file the proofs of service.

Respectfully submitted,

*Steven J. Moser*

Steven J. Moser